

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

FILED BY *je* D.C.
OCT 31 PM 2:05

RANDY W. MORGAN, SR.,

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE

Plaintiff,

vs.

**Civil Action No. 05-2541 Map
JURY TRIAL DEMANDED**

SHELBY COUNTY GOVERNMENT,

Defendant.

JOINT RULE 16(b) SCHEDULING STIPULATION/ORDER

Pursuant to written notice, a scheduling conference was held November 3, 2005. Present were Kathleen L. Caldwell, counsel for Plaintiff, and David A. Prather, counsel for Defendant. At the conference, the following dates were established as the final dates for:

INITIAL DISCLOSURES: November 17, 2005

JOINING PARTIES: January 3, 2006

AMENDING PLEADINGS: January 3, 2006

INITIAL MOTIONS TO DISMISS: February 3, 2006

COMPLETING ALL DISCOVERY:

(a) DOCUMENT PRODUCTION: June 2, 2006

(b) DEPOSITIONS, INTERROGATORIES, AND REQUESTS
FOR ADMISSIONS: June 2, 2006

(c) EXPERT DISCLOSURE (Rule 26):

- (1) DISCLOSURE OF PLAINTIFF'S RULE 26
EXPERT INFORMATION: March 6, 2006
- (2) DISCLOSURE OF DEFENDANT'S RULE 26
EXPERT INFORMATION: April 3, 2006
- (3) EXPERT WITNESS DEPOSITIONS: June 2,
2006

FILING DISPOSITIVE MOTIONS: July 5, 2006

OTHER RELEVANT MATTERS:

No depositions may be scheduled to occur after the discovery cutoff date. All motions, requests for admissions, or other filings that require a response must be filed sufficiently in advance of the discovery cutoff date to enable opposing counsel to respond by the time permitted by the Rules prior to that date.

Motions to compel discovery are to be filed and served by the discovery deadline or within 30 days of the default or the service of the response, answer, or objection, which is the subject of the motion, if the default occurs within 30 days of the discovery deadline, unless the time for filing of such motion is extended for good cause shown, or the objection to the default, response, answer, or objection shall be waived.

This case is set for jury trial, and the trial is expected to last 8 days. The pretrial order date, pretrial conference date, and trial date will be set by the presiding judge.

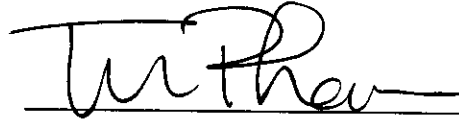
This case is appropriate for ADR. The parties are directed to engage in court-annexed attorney mediation or private mediation after the close of discovery.

The parties are reminded that pursuant to Local Rule 11(a) (1) (A), all motions, except motions pursuant to Fed. R. Civ. P. 12, 56, 59, and 60 shall be accompanied by a proposed order.

The opposing party may file a response to any motion filed in this matter. Neither party may file an additional reply, however, without leave of the court. If a party believes that a reply is necessary, it shall file a motion for leave to file a reply accompanied by a memorandum setting forth the reasons for which a reply is required.

The parties have not consented to trial before the Magistrate Judge.

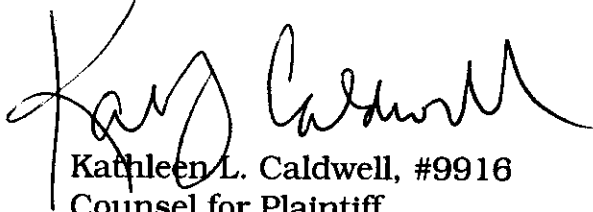
This order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the scheduling dates set by this order will not be modified or extended.



TU M. PHAM

United States Magistrate Judge

DATE: October 31, 2005



Kathleen L. Caldwell, #9916

Counsel for Plaintiff

**2080 Peabody Avenue - Laird Place
Memphis, TN 38104**

Telephone: (901) 274-2075

Facsimile: (901) 274-2085



David A. Prather

Counsel for Defendant

**795 Ridge Lake Blvd.,
Suite 300**

Memphis, TN 38120

Telephone: (901) 291-1500

Facsimile: (901) 291-1501

*by fax
by telephone
permission*



Notice of Distribution

This notice confirms a copy of the document docketed as number 8 in case 2:05-CV-02541 was distributed by fax, mail, or direct printing on November 2, 2005 to the parties listed.

Herbert E. Gerson
FORD & HARRISON, LLP- Ridge Lake Blvd.
795 Ridge Lake Blvd.
Ste. 300
Memphis, TN 38120

Kathleen L. Caldwell
LAW OFFICE OF KATHLEEN L. CALDWELL
2080 Peabody Ave.
Memphis, TN 38104

Honorable Samuel Mays
US DISTRICT COURT